REMARKS

I.   Introduction

In response to the Office Action dated February 8, 2005, claims 1, 5-7, 11-13, and 17-18 have been amended, and claims 19-21 have been added. Claims 1-21 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II.   Prior Art Rejections

In paragraph (1) of the Office Action, claims 1-3, 709, and 13-15 were rejected under 35 U.S.C. §102(b) as being anticipated by Hollingsworth et al., U.S. Patent No. 5,444,836 (Hollingsworth). In paragraph (2) of the Office Action, claims 4, 10, and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hollingsworth in view of Matsushita et al., U.S. Patent No. 6,049,340 (Matsushita). In paragraph (3) of the Office Action, claims 5, 6, 11, 12, 17, and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hollingsworth in view of Felser et al., U.S. Patent No. 6,025,849 (Felser).

Specifically, the independent claims were rejected as follows:

> As to claims 1, 7, and 13, Hollingsworth discloses an apparatus and method for creating and applying flexible, user defined rules for placement of graphical objects in a computer aided drafting (CAD) application. The placement subsystem (100) and its relationship to other subsystems are shown in Fig. 1. Placement subsystem (100) communicates with database subsystem (102) over bidirectional communication link (110) to retrieve information and attributes associated with graphical objects to be placed on a graphical image. Database subsystem (102) may represent any database means capable of storing and retrieving information (claim 13). Placement subsystem (100) manipulates the information retrieved from database subsystem (102) by applying user defined rules to determine the proper placement of the graphical objects on the graphical image [column 4, lines 65-66]. As shown in Fig. 2, these subsystems (100) (102) (104) may coexist on a common computer system (210) (claim 7) [column 5, line 14[. The rule-processing component (200) represents the rule application means for automatically reading and applying the placement rules defined by the user of the rule definition means [column 5, lines 58-61].

Applicants traverse the above rejections for one or more of the following reasons:

(1)   Hollingsworth fails to teach, disclose or suggest a location within a drawing for an object with respect to another object, area, or space;

(2)   Hollingsworth fails to teach, disclose or suggest an automatic location property that provides a defined location within a drawing; and

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(3)   Hollingsworth fails to teach, disclose or suggest a value for a property of one or more objects from another object area or space that is based on the location of the object (i.e., as specified in the automatic location property).

Independent claims 1, 7, and 13 are generally directed to determining/specifying a location for an object within a drawing. Specifically, a drawing (in a drawing program) contains one or more objects that each comprise a collection of graphical elements. An automatic location property is defined for the one or more objects. The claims explicitly provide and define the automatic location property. First, the automatic location property provides a location, within the drawing, for the one or more objects with respect to another object, area, or space. Additionally, a value for a property of the one or more objects is obtained from property data of the other object, area, or space where and based on the location of the one or more objects. Accordingly, a location property for an object provides a location for the object wherein the location value is based on data from another object, area, or space that the object is associated with.

These claim attributes provide the unique ability to define the location of the object within a drawing based on other/nearby objects, areas, or spaces. The dependent claims set forth further details regarding the location. In addition, the new dependent claims provide additional limitations that reflect the location based attributes of the location property.

For example, new dependent claims 20, 22, and 24 provide for automatically retrieving data for the one or more objects from the other object, area, or space where the one or more objects are located. In other words, when the location property provides that the one or more objects reside with or are associated with a particular object, area, or space, data for the one or more objects are automatically retrieved from the particular object, area, or space it is associated with (i.e., where it is located).

In addition, dependent claims 5-6, 11-12, and 17-18 provide for the use of a location grip in determining the location of the object. In this regard, a location grip is displayed in a drawing and the position of the location grip within the drawing determines the location of the object.

The cited reference fails to teach, disclose, or suggest these various elements of Applicants' independent claims.

Hollingsworth merely describes apparatus and methods for creating and applying flexible, user defined rules for placement of graphical objects in a computer aided drafting (CAD)

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application. User defined rules are applied by a placement subsystem to automate the proper placement of graphical objects according to the specific rules of the particular user. (See Abstract).

However, Hollingsworth completely fails to provide a location property for an object. Instead, Hollingsworth merely describes how to place an object in an image. Rules are used to determine the proper placement of an object. However, rather than the claimed location property, Hollingsworth has a series of rules that determine where to place an object and not a "location" as claimed. Further, Hollingsworth's rules do not provide a location within the drawing for an object with respect to another object, area, or space. Instead, the rules merely govern placement and orientation of a class of graphical objects on a graphical image (see col. 3, lines 5-8).

In addition, the limitations of the currently claimed elements must be read in conjunction with each other. The current claims use the automatic location property and the location stored within the property to obtain a value of a property of the one or more objects. In this regard, an actual property value (of an object) is based on a property value of another object/area/space that the first object is associated with or located. Hollingsworth completely fails to teach such an inventive concept. The rules for placing Hollingsworth's objects do not specify a "location" for the object or a location such that the location is within another object/area/space and that other object/area/space is where a property value is obtained from.

Again, there are two distinct aspects to the claims. The first aspect provides a location for an object. The location is with respect to/associated with another object/area/space. The second aspect provides for a property of the object that is based on the other/area/space that the object is associated with (i.e., based on the location of the object). These two (2) unique attributes are lacking from Hollingsworth and the other cited references.

Finding similarities between such unique claim elements and Hollingsworth is impossible. In this regard, Hollingsworth's placement of an object does not and cannot teach a location of an object or the retrieval of a property based on both the location of the object and the object/area/space where the object is located.

Matsushita also fails to cure Hollingsworth's deficiencies. Matsushita merely describes a computer aided design (CAD) system in which graphic drawings are generated by the user selecting and placing figures representing objects such as walls and doors on a screen. This is accomplished using a command selecting unit that selects a command for placing an object of a desired shape in a

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desired position. Once the command is selected a parameter managing unit is engaged. This parameter managing unit holds parameters used to execute the selected command and also displays values set for the parameters in a parameter field on a display screen. The user may also enter desired values for the parameters using a parameter entering unit. In response to a user request to execute a command, a command executing unit determines the position and shape of the object using the values set for the parameters, and places the object in the proper location of the drawing display area.

Thus, Matsushita also merely provides for placing an object. However, the unique two attributes of the claims are completely lacking from Matsushita.

Felser merely describes a framework is described that serves as an expression evaluator and notification manager for software objects, and can traverse individual object models to use parts of one model to define another. An object model (data model) is a map of an object's properties and methods, and the framework of the present invention binds to the properties and methods and intercepts access to the properties for storage and evaluation of variables within the definitions of the properties. Binding the framework to the object accesses and uses the type info for the object to determine the properties of the object. In addition, the framework provides a method for the object author to override and specialize the properties to describe extensions of the type information.

However, like Hollingsworth and Matsushita, Felser also lacks any discussion about the two unique aspects of the presently claimed invention.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Hollingsworth, Matsushita, and Felser. In addition, Applicants' invention solves problems not recognized by Hollingsworth, Matsushita, and Felser.

The Office Action rejects dependent claims 4, 10, and 16 based on Hollingsworth and Matsushita. Applicants submit that such rejections are without merit. Nowhere in Matsushita is there any description of a determination of an automatic door number. In this regard, electronic searches of Matsushita for the terms "automatic" or "door number" provide no results whatsoever. Without even mentioning the term "automatic", Matsushita cannot possibly teach the automatic determination of a door number as claimed. The obviousness determination specified in the Office Action provides that the automatic placement reduced the burden on the user of manually applying complex drafting rules in creating or modifying graphical images. These dependent claims address

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the use of a door number that is automatically determined and not the automatic placement of a door. Further, the door number is based on a space where the door is located. No such construct or teaching is even remotely alluded to in either Matsushita or Hollingsworth.

Dependent claims 5, 6, 11, 12, 17, and 18 address a location grip that is displayed in the drawing and used to determine the location of the object. Further, the grip location determines where the value for the property of the object is obtained from. The Office Action rejects these claims based on Hollingsworth and Felser. However, both Hollingsworth and Felser completely lack any discussion, implicit or explicit of a grip. In fact, electronic searches of both Hollingsworth and Feler for the term "grip" provides no results whatsoever. Without even mentioning the word "grip", these references cannot possibly teach the specific use of a grip to determine a location of an object with respect to another object/area/space. The Office Action attempts to use Felser's handles and resizing to equate to the grips as claimed. However, handles and resizing directly manipulate the actual object and are not merely used as a location grip to specify a location for the object with respect to other objects/areas/spaces that is then used to determine a property value (as claimed).

Thus, Applicants submit that independent claims 1, 7, and 13 are allowable over Hollingsworth, Matsushita, and Felser. Further, dependent claims 2-6, 8-12, and 14-21 are submitted to be allowable over Hollingsworth, Matsushita, and Felser in the same manner, because they are dependent on independent claims 1, 7, and 13, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-6, 8-12, and 14-21 recite additional novel elements not shown by Hollingsworth, Matsushita, and Felser.
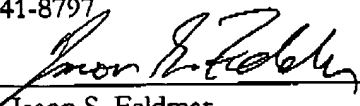
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III.   Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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